WRITER'S DIRECT ACESS 202 862 3803 CRice@Steptoe.com Steptoe STEPTOE & JOHNSON LLP

1330 Connecticut Avenue, NW Washington, DC 20036 1795 202 429 3000 main www.steptoe.com

## Via Hand Delivery

## Contains Confidential Business Information Do Not Disclose

December 2, 2015

Document Processing Desk (**DCI/AD**) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

Attention: Rose Kyprianou (7506P)

Reevaluation Team Leader (PM 36)

Subject: 90-day response to GDCI-043901-30859

Company: BASF Corporation (EPA Company No. 33753)

Dear Ms. Kyprianou:

On behalf of BASF Corporation ("BASF"), EPA Company Number 33753, we are submitting a 90-day response to the Generic Data Call-In (GDCI) for Glutaraldehyde. BASF is addressing the GDCI data requirements on this product as follows:

Guideline	Study Title	Response
		Option 6
835.4100	Aerobic Soil Metabolism	MRID 44691601

Where the following codes were used that are consistent with Page 8 of the PDCI instructions:

• Option 6: Citing to an Existing Study

By providing this information, BASF believes it has addressed all data requirements associated with the GDCI. Therefore, no additional GDCI information will provided to EPA.

Rose Kyprianou December 2, 2015 Page 2



In case you have any questions on this 90-day response, please contact either Marie Paquette, BASF Senior Product Regulations Specialist at 973-245-6370 or me using the information listed above.

Sincerely,

Catherine Rice

Environmental Specialist

U.S. Agent for BASF

United States Environmental Protection Agency Washington, D.C. 20460							
		DATA CALL-IN	RESPONSE				
INSTRUCTIONS: Please type Use additional sheet(s) if neces		e read carefully the attached instructio	ns and supply the information requested	on this form.			
Company Name and Address     BASF CORPORATION     100 PARK AVENUE     FLORHAM PARK, NJ 0		Case # and Nar     2315 Glutaral     Chemical # and     Glutaraldehyd	ldehyde Name 043901	3. Date and Type of DCI an 28-Aug-2015 GENERIC ID# GDCI-043901-			
4. EPA Product	5. I wish to	6. Generic Data		7. Product Specific Data			
Registration	cancel this product regis- tration volun- tarily	6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA regis- tration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."		
33753-23 33753-26 33753-27 33753-30 33753-31	no no no no	NA 33753-23, 33753-23, 33753-23,	yes NA NA NA	N.A. N.A. N.A.	N.A. N.A. N.A.		
8. Certification I cortify that the knowingly false of insleading sometimes of Companion of Comp	statement may be pur	hishable by fine, imprisonment or both	rue, accurate, and complete. I acknowle under applicable law.  Sr. Plaker Regulations	0. 5415	11/15		
10. Name of Company	STSF CL	RPORATION		11. Phone Number	973-245-6370		

## United States Environmental Protection

Agency Washington, D.C. 20460									OMB Approval 2070-174		
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE											
INSTRUCTIONS: Please typ Use additional sheet(s) if nec	e or print in ink. Please read carefully the essary.	ne attached instructions and s	upp	y the	infor	mati	on requested on this for	rm.			
Company Name and Address     Case # all								3. Date and Type	e of DCI and Nun	nber	
BASE CORPORATION		2315 Glutaraldehyde	9					28-Aug-2015			
100 PARK AVENUE		Chemical # and Name 043901						GENERIC			
FLORHAM PARK, NJ 07932		Glutaraldehyde						ID# GDCI-043901-30859			
4. Guideline Requirement Number	5. Study Title		F0001021	Progress Reports		ss s	6. Use Pattern	7. Test Substance		8. Time Frame (Months)	9. Registrant Response
			100	1	2	3					
Environmental Fate Data Requiremental Fate Data Requir		nts (Antimicrobial)	湖		<b>一类型数数</b>	77 174 175		7	20		
835.4100	Aerobic soil metabolism	(1,2)	N			Ì	V, R, U, Y, T, X, Z	TGAI	2	24	6
							12				
20						3					
10. Certification I certify the	at the statements made on this form and statement may be punishable by fine.	d all attachments are true, acc	curat	e, an	d cor	nplet	te. I acknowledge that	any 11. Date	0/	1	
knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law  Signature and Title of Company's Authorized Representative Mary Available Sr. Acquest Regulations							2.	f2//	115		
12. Name of Company BASF CORPORATION						13. Phone	f2/1/15  13. Phone Number 9/73 - 245 - 6370				